



Wyoming Department of Agriculture

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November 15, 2004

Content Analysis Team
ATTN: Roadless State Petitions
USDA Forest Service
P.O. Box 221090
Salt Lake City, UT 84122

Dear Content Analysis Team members:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Proposed Rule to replace the Roadless Area Conservation Rule with a State Petitioning Process for Inventoried Roadless Area Management.

Our comments are specific to our mission within state government which is to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed rule will have major impacts upon our agriculture industry, our natural resources, and the welfare of our citizens, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

Our comments are divided into three components dealing with the replacement of the roadless rule: governor's involvement, resource inventory, and the roadless title.

Governor's Involvement

The management of identified roadless areas are simply management prescriptions that need to be addressed at the local forest in their planning procedures. The process is currently in place to allow state governments to participate in the local planning process with each forest. We first support the locally-led efforts of each individual forest to provide cooperating agency status to state and local governments to address the management of roadless areas.

However, in the event that local forest planning does not adequately address these roadless areas, we support the petition process as an additional tool to alter management of these areas. When all else fails in the local planning process, the governor still has the means to address local issues.

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We support the one-time petition process that is proposed for the establishment or adjustment of management requirements, only if a review period is established to assess the decisions every 5 to 10 years. Without an option to review the petitions in the future, this process is too restrictive. The proposed process takes a permanent multiple-use closure approach, which is inconsistent with policy for national forest lands outside of wilderness areas. By allowing only a one-time petition with a review of the resource decision, the natural resource managers and multiple users are forced to recognize and prescribe permanent management for the resource only as the resource appears within the next 18 months. This process ignores the adaptive management principle of natural resource and forestry management. In the event that any of these inventoried roadless areas alters its current condition, the management prescription should be allowed to change without the restriction of another broad-scale rule. This can be addressed during a 5 or 10-year review of the decisions and should be included in this proposed rule. By adding the review period, the management will be a termed commitment, similar to forest plans.

Roadless areas should be identified locally at the forest level, and managed as areas of special resource. Top-down, broad-scale, one-size-fits-all amendments do not always work for natural resource conservation. This is why each individual national forest is managed separately from other forests in the region.

Resource Inventory

We agree with the proposed rule that there are too many unidentified roads and trails in the national forests. Attention is needed to identify open and closed roads and trails. With the new rule on designated routes and areas for motor vehicle use on national forest lands, the need for this assessment and improved inventory is twice as evident. New technologies exist, like GIS enhanced Color IR low level photography, to help identify roads and trails and thus management.

Management of the resource is only half of the effort needed to identify and secure roadless areas. Education and enforcement are needed to ensure that following a successful resource inventory, resource users are provided with the opportunity and incentive to recognize the designated use of roadless areas. Individual forest personnel, a governor, or a local forest planning group can identify areas to fall under the roadless banner. These areas can be designated roadless, and the management adjusted as a result. However, this effort will be of no avail if proper signage, education and enforcement are not provided to coincide with the management of these areas.

The "Roadless" Title

Since these identified roadless areas contain roads, it is a legitimate oxymoron that these areas are called roadless. We request that the word "roadless" be replaced by the term "conservation area."

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In closing, if local forest planning cannot address the needs of roadless areas, we will support the one-time petition process by the governor, but only if a 5 to 10-year review criteria is added. We support the Forest Service in their desire to inventory the resource and encourage it to be done expeditiously.

We appreciate the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "John Etchepare", is written over a printed name and title. The signature is stylized with a large, sweeping initial "J" and "E".

John Etchepare
Director

JE/mh

Cc: Governor's Planning Office
Wyoming Game and Fish Department
Wyoming State Forestry